

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on  
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)  
ECF Case

*This document relates to:*

*Estate of John P. O'Neill, et al. v. Republic of Iraq, et al.*, 04-CV-1076(RCC)

*Estate of John P. O'Neill, et al. v. Kingdom of Saudi Arabia, et al.* 04-CV-1922 (RCC)

*Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al*, 04-CV-1923 (RCC)

**NOTICE OF MOTION FOR LEAVE TO  
WITHDRAW AS ATTORNEY OF RECORD**

PLEASE TAKE NOTICE that upon the annexed Declaration of Jerry S. Goldman, Esquire, Plaintiffs will respectfully move this Court, at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for entry of an order pursuant to Local Rule 1.4, relieving Gina M. MacNeill, Esquire as attorney of record for the Estate of John P. O'Neill, Sr., et al. in the above referenced cases.

Dated: August 28, 2006  
New York, NY

Respectfully submitted:

Jerry S. Goldman, Esquire (JG8445)  
Law Offices of Jerry S. Goldman  
& Associates, P.C.  
111 Broadway, 13<sup>th</sup> Floor  
New York, NY 10006

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on  
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)  
ECF Case

*This document relates to:*

*Estate of John P. O'Neill, et al. v. Republic of Iraq, et al.*, 04-CV-1076(RCC)

*Estate of John P. O'Neill, et al. v. Kingdom of Saudi Arabia, et al.* 04-CV-1922 (RCC)

*Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al*, 04-CV-1923 (RCC)

**DECLARATIONS IN SUPPORT OF MOTION FOR LEAVE TO WITHDRAW  
AS ATTORNEY OF RECORD**

1. I am a member of the Law Offices of Jerry S. Goldman& Associates, P.C. 111 Broadway, 13<sup>th</sup> Floor, New York, NY 10006, and one of the attorneys of record for the *Estate of John P. O'Neill, Sr., et al.* in the above referenced cases.
2. I am fully familiar with the facts and circumstances as set forth herein and make this Declaration in support of the Law Offices of Jerry S. Goldman & Associates, P.C.'s application to relieve Gina M. MacNeill, Esquire as an attorney of record for the *Estate of John P. O'Neill, et al.* Plaintiffs in the above captioned matters.
3. Gina M. MacNeill, Esquire is no longer affiliated with the Law Offices of Jerry S. Goldman & Associates, P.C.
4. Fort he foregoing reasons, the undersigned respectfully requests that this Court grant the Law Offices of Jerry S. Goldman & Associates, P.C. leave to relieve Gina M. MacNeill, Esquire as an attorney of record in the above captioned matters. A proposed Order is attached hereto for the Court's convenience.

5. I certify that all of the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 28, 2006  
New York, NY

Respectfully submitted:

---

Jerry S. Goldman, Esquire (JG8445)  
Law Offices of Jerry S. Goldman  
& Associates, P.C.  
111 Broadway, 13<sup>th</sup> Floor  
New York, NY 10006

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re TERRORIST ATTACKS on  
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)  
ECF Case

*This document relates to:*

*Estate of John P. O'Neill, et al. v. Republic of Iraq, et al.*, 04-CV-1076(RCC)

*Estate of John P. O'Neill, et al. v. Kingdom of Saudi Arabia, et al.* 04-CV-1922 (RCC)

*Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al*, 04-CV-1923 (RCC)

## ORDER

This matter came before the Court on Motion by the Law Offices of Jerry S. Goldman & Associates, P.C. to remove Gina M. MacNeill, Esquire as an attorney of record in the above captioned matters.

Good cause being shown, it is hereby ORDERED that Gina M. MacNeill, Esquire  
is relieved as an attorney of record for the above captioned matters.

It is further ORDERED that appearances of Jerry S. Goldman, Esquire, Fred Salek, Esquire, and Joshua Ambush, Esquire for the above referenced actions will remain unchanged.

ENTERED:

---

**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2006, I caused an electronic copy of the foregoing **NOTICE OF MOTION FOR LEAVE TO WITHDRAW AS ATTORNEY OF RECORD** to be served electronically by the Court's Electronic Case Filing (ECF) System.

---

JERRY S. GOLDMAN, ESQUIRE

August 28, 2006